

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Karon A. Simmons,  
Debtor.

Case No. 23-11011-AMC

Chapter 13

Related to ECF No. 72

**Debtor's Objection to Motion for Relief from Stay filed by PNC Bank. N.A.**

**AND NOW**, Debtor Karon A. Simmons, by and through her attorney, hereby objects to the Motion for Relief from Stay filed by PNC Bank. N.A., for the following reasons:

1. The alleged arrearage is inconsequential.
2. The alleged arrearage can be cured through a modified chapter 13 plan.

**NOW, THEREFORE**, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in her favor as may be necessary and proper under the law.

Date: August 6, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By: /s/ Michael A. Cibik  
Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
mail@cibiklaw.com

**Certificate of Service**

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by PNC Bank. N.A. to be served on all parties on the clerk's service list through the CM/ECF system.

Date: August 6, 2024

/s/ Michael A. Cibik  
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Karon A. Simmons,  
  
Debtor.

Case No. 23-11011-AMC

Chapter 13

Related to ECF No. 72

**Order Denying Motion for Relief from Stay filed by PNC Bank, N.A.**

**AND NOW**, upon consideration of the Motion for Relief from Stay filed by PNC Bank, N.A., and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.

Date:

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Ashely M. Chan  
Chief U.S. Bankruptcy Judge